

# **Exhibit 94**

1  
2 UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

3 Case No. 14-Civ-07694 (JFK)

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YIEN-KOO KING, NORTHWICH INVESTMENTS,  
5 LTD., and SOON HUAT, INC.,

6 Plaintiffs,

7 -against-

8 ANDREW WANG, SHOU-KUNG WANG, BAO WU  
TANG, JIAN BAO GALLERY, ANTHONY CHOU,  
9 CHEN-MEI-LIN, WEI ZHENG, YE YONG-QING,  
YUE DA-JIN and JOHN DOES 1-9,

10 Defendants.

11 - - - - -x

12 June 18, 2019

13 9:36 a.m.

14  
15 Videotaped deposition of  
16 KENNETH KING, taken by Defendants,  
17 pursuant to Notice, held at the offices of  
18 Kasowitz Benson Torres LLP, 1633 Broadway,  
19 New York, New York, before Sharon Pearce,  
20 a Registered Merit Reporter, Certified  
21 Realtime Reporter, and Notary Public of  
22 the State of New York.

<p style="text-align: right;">Page 62</p> <p>1</p> <p>2 A. I don't know why. I can't</p> <p>3 remember.</p> <p>4 Q. Okay. Is Sixteen Luohans</p> <p>5 currently in your possession?</p> <p>6 A. I believe so.</p> <p>7 Q. Did you sell Sixteen Luohans?</p> <p>8 A. I don't think so.</p> <p>9 Q. Is it possible that you sold</p> <p>10 Sixteen Luohans?</p> <p>11 MR. ISRAEL: Objection. You can</p> <p>12 answer.</p> <p>13 A. It's possible but not likely.</p> <p>14 Q. Why do you say that it's</p> <p>15 possible?</p> <p>16 A. Because we are not familiar with</p> <p>17 Chinese paintings. And the name is very</p> <p>18 hazy to me.</p> <p>19 Q. Okay. Have you sold some</p> <p>20 Chinese paintings --</p> <p>21 A. Yes, we have.</p> <p>22 Q. Can you think of the names of</p> <p>23 any of those paintings?</p> <p>24 A. No, I cannot.</p> <p>25 Q. Approximately how many paintings</p>	<p style="text-align: right;">Page 64</p> <p>1</p> <p>2 Q. I understand.</p> <p>3 A. I don't believe we sold.</p> <p>4 Q. I understood you to be saying</p> <p>5 that it was possible that you had sold the</p> <p>6 painting.</p> <p>7 A. It's possible, yes.</p> <p>8 Q. Do you have records of which</p> <p>9 paintings you've sold?</p> <p>10 A. No. We don't have records.</p> <p>11 Sorry.</p> <p>12 Q. Are they sold via handshake</p> <p>13 deals?</p> <p>14 A. Basically.</p> <p>15 Q. Do you have receipts for the</p> <p>16 sales of the paintings?</p> <p>17 A. No, we do not have receipts.</p> <p>18 Q. Would that be a normal practice</p> <p>19 to not maintain a receipt?</p> <p>20 MR. ISRAEL: Objection.</p> <p>21 A. In Chinese --</p> <p>22 MR. ISRAEL: Wait a second.</p> <p>23 Objection. Now you can answer.</p> <p>24 A. In Chinese tradition, you know,</p> <p>25 when people deal with paintings, it's also</p>
<p style="text-align: right;">Page 63</p> <p>1</p> <p>2 have you sold?</p> <p>3 A. Probably six to eight.</p> <p>4 Q. Have you sold those at auctions?</p> <p>5 A. No.</p> <p>6 Q. In private sales?</p> <p>7 A. Yes.</p> <p>8 Q. Are any of those six to eight</p> <p>9 paintings paintings that were listed on</p> <p>10 the inventory?</p> <p>11 A. I didn't check.</p> <p>12 Q. Okay. Well, do you remember,</p> <p>13 sitting here now, whether those paintings</p> <p>14 were the property of Northwich?</p> <p>15 A. I think the paintings we sold,</p> <p>16 we are very careful. We make sure that</p> <p>17 these are paintings that we -- that never</p> <p>18 was in C.C.'s possession, you know,</p> <p>19 because after -- if a painting was in</p> <p>20 C.C.'s possession, we are restricted by</p> <p>21 the TROs.</p> <p>22 Q. Okay. How would you find out</p> <p>23 whether Sixteen Luohans is one of the</p> <p>24 paintings that you've sold?</p> <p>25 A. I didn't say we sold.</p>	<p style="text-align: right;">Page 65</p> <p>1</p> <p>2 a handshake.</p> <p>3 Q. Okay. So it would not be</p> <p>4 unusual in your experience for there to</p> <p>5 not be a receipt of the transaction?</p> <p>6 A. What we were told is this is a</p> <p>7 normal procedure.</p> <p>8 Q. Okay. Did you work with a</p> <p>9 broker?</p> <p>10 A. Pardon?</p> <p>11 Q. Did you work with a broker?</p> <p>12 A. No.</p> <p>13 Q. How did you find the buyers for</p> <p>14 these paintings?</p> <p>15 A. I think the buyer found us.</p> <p>16 Q. Okay. Do you recall the names</p> <p>17 of any of the buyers?</p> <p>18 A. No, we don't.</p> <p>19 Q. Do you recall when the last time</p> <p>20 you sold a painting was?</p> <p>21 A. I don't even remember when.</p> <p>22 Q. Okay.</p> <p>23 A. Yes.</p> <p>24 Q. Was it in the last five years?</p> <p>25 A. Possible.</p>

17 (Pages 62 - 65)